



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

APR 15 1999

DATE:

SUBJECT: Confirmation of Verbal Authorization to Conduct a  
CERCLA Removal Action at Graebel Van Lines, Moorestown,  
Burlington County, New Jersey - ACTION MEMORANDUM

FROM: Dilshad J. Perera, On-Scene Coordinator *[Signature]*  
Response and Prevention Branch

TO: Richard L. Caspe, Director  
Emergency and Remedial Response Division

THRU: Bruce Sprague, Chief  
Response and Prevention Branch

Site ID No.: MA

I. PURPOSE

The purpose of this action memorandum is to confirm the verbal authorization granted by Richard L. Caspe, Director, Emergency and Remedial Response Division, to conduct a removal action at Graebel Van Lines, Moorestown, Burlington County, New Jersey.

The verbal authorization granted on October 6, 1998, allocated a total project ceiling of \$30,000 of which \$20,000 was for mitigation contracting.

On October 2, 1998, Graebel Van Lines was moving old furniture from the City of Philadelphia Department of Human Services to a scrapyard in Camden, New Jersey. The load was rejected at the scrapyard due to excessive wood content. The load was re-routed to SPC Scrapyard in Philadelphia, Pennsylvania where a radiation detector was set off indicating that some material in the load was apparently radioactive. The truck then returned to the Graebel Van Lines facility in Moorestown, New Jersey. While company officials were contemplating their course of action, an employee anonymously notified the Pennsylvania Department of Environmental Protection (PADEP).

On October 5, 1998, Region III, upon being notified by PADEP notified the U.S. Environmental Protection Agency (EPA) Region II's Response and Prevention Branch. New Jersey Department of Environmental Protection's (NJDEP) Bureau of Environmental Radiation on this same date, also had notified Region II's Radiation and Indoor Air Branch.

On October 5, 1998, NJDEP requested that the EPA conduct a removal action under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended, 42 U.S.C. 9601 et seq.

This Action Memorandum provides funding for the storage, transportation and disposal of the hazardous substances present at this site.

This site is not on the National Priorities List (NPL) and there are no nationally significant or precedent-setting issues associated with this removal action.

## II. SITE CONDITIONS AND BACKGROUND

### A. Site Description

#### 1. Removal Site Evaluation

A radium 226 source was found in a two drawer filing cabinet located in the tractor trailer. The source consisted of a single needle similar to the ones used in the past for cancer treatment. Observed instrument readings at the source indicated a dose rate of 2R/hour. At a foot away, the observed dose rate reading was 60mR/hour. A gamma scan conducted by the Department of Energy's Brookhaven National Laboratory (DOE-BNL) determined the activity to be 7mCi. The needle was discovered in the original storage container, known as a pig. The pig along with the radium needle was subsequently placed in a larger pig by DOE-BNL personnel. The pig was then placed in the center of an out-of-service trailer parked within the fenced-in area of the facility.

#### 2. Physical Location

Graebel Van Lines is located in a rural setting. However, the facility borders a large residential housing complex.

#### 3. Site Characteristics

Graebel Van Lines is an active moving company. The rear portion of the facility is fenced and appears to be in good condition. The normal business hours of the facility are 8:00am to 5:00pm. During this period, a typical work force consists of approximately 60 personnel.

4. Release or Threatened Release Into the Environment of a Hazardous Substance, or Pollutant or Contaminant

The radioactive needle was stored in a trailer located at the Graebel Van Lines facility. At the present time the needle has been relocated to a licensed temporary storage facility and is awaiting final disposal.

The following hazardous substance was identified at the site:

Hazardous Substance

Statutory Source of  
Designation as a  
Hazardous Substance

Radium 226

Clean Air Act Section 112

Inhalation, ingestion or bodily exposure to radium can lead to lung cancer, bone cancer, osteitis, skin damage and blood dyscrasia. The radium needle in question was used for various forms of cancer therapy in the past.

5. National Priorities List Status

The site is currently not listed on the National Priorities List (NPL).

B. Other Actions to Date

1. Previous Actions

NJDEP activated DOE-BNL to identify and secure the source. The source was identified as Radium 226 with an activity of 7mCi. The source and its original pig were placed in a pig supplied by DOE-BNL. The package was then placed in yet another pig also supplied by DOE-BNL. The entire package was then placed in an out-of-service trailer, which was then subsequently locked.

2. Current Actions

There are no activities occurring at the site. The disposal of the needle has been arranged.

C. State and Local Authorities' Roles

1. State and Local Actions to Date

NJDEP conducted the assessment and activated DOE-BNL.

2. Potential for Continued State/Local Response

Neither NJDEP nor the local government had the resources available to conduct the necessary removal action at this site.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats To Public Health or Welfare

The radium needle is presently stored at a licenced temporary storage facility.

B. Threats to the Environment

Not applicable.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of a hazardous substance from this site, if not addressed by implementing the response action selected in this Action Memorandum, may have presented an imminent and substantial endangerment to public health, or welfare, or to the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed Action Description

The transportation, storage and ultimate disposal of the radium needle and the pigs housing the needle.

2. Contribution to Remedial Performance

This removal action will completely remediate this site and as such, no long term remedial measures will be required.

3. Applicable or Relevant and Appropriate Requirements (ARARs)

ARARs within the scope of this removal, including RCRA and CERCLA regulations that pertain to the disposal of hazardous wastes, will be met to the extent practicable.

4. Project Schedule

The needle has been moved to a licensed storage facility and is awaiting final disposal in Washington.

B. Estimated Costs

Extramural Costs

<u>Regional Allowance Costs:</u> (Total Clean-up Contractor Costs include labor, equipment, materials, and laboratory disposal analyses)	\$ 20,000
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Other Extramural Costs not Funded  
From the Regional Allowance:

Total; START, including multiplier costs	\$ 0
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Subtotal, extramural costs	\$ 20,000
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TOTAL, EXTRAMURAL COSTS (rounded to nearest \$1,000)	\$ 20,000
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Intramural Costs:

Intramural Direct Costs	\$ 5,000
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Intramural Indirect Costs	\$ 5,000
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TOTAL, INTRAMURAL COSTS	\$ 10,000
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<u>TOTAL, REMOVAL PROJECT CEILING</u>	\$ 30,000
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VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR  
NOT TAKEN

Delayed action or no action could have resulted in the release of a hazardous substance into the environment, thereby exposing the employees and nearby residents to a hazardous substance. Furthermore, unrestricted access onto the property could have exposed individuals by direct contact.

VII. OUTSTANDING POLICY ISSUES

There are no outstanding policy issues associated with this site.

VIII. ENFORCEMENT

The On-Scene Coordinator will work with the Office of Regional Counsel, Removal Action Branch and Region III to determine the Potentially Responsible Party (PRP).


IX. RECOMMENDATION

This decision document represents the selected Removal Action at Graebel Van Lines Site, Moorestown, New Jersey. This document was developed in accordance with CERCLA as amended, and is not inconsistent with the National Contingency Plan (NCP). This decision is based on the Administrative Record for the site. Conditions at the site meet the criteria for a removal action pursuant to Section 300.415(b)(2) of the NCP.

This Action Memorandum will confirm the verbal authorization of October 6, 1998, by Richard L. Caspe, Director, Emergency and Remedial Response Division to conduct this removal action. The total project ceiling was \$30,000, of which \$20,000 came from the FY-99 Regional Advice of Allowance.

Please indicate your approval, as per current delegation of authority, by signing below.

Approval: \_\_\_\_\_

  
Richard L. Caspe, Director  
Emergency and Remedial Response Division

Date: 4/15/99

Disapproval: \_\_\_\_\_

Richard L. Caspe, Director  
Emergency and Remedial Response Division

Date: \_\_\_\_\_

cc: (after approval is obtained)

R. Caspe, 2ERRD  
B. Sprague, 2ERRD-RPB  
J. Daloia, 2ERRD-RPB-ERT  
R. Gherardi, 2OPM-FINB  
K. Weaver, 2OPM-GCMB  
A. Tao, 2OPM-GCMB  
M. Truono, 2ERRD-RAB  
J. Witkowski, 2ERRD-RAB  
J. MacGillivray, 2ORC-NJSFB  
B. Bellow, 2CD  
R. Cahill, 2CD-PAT  
P. McKenchnie, 2OIG  
T. Johnson, 5202G  
A. Raddant, USDOJ  
J. Smolenski, NJDEP  
J. Feeney, NJDEP